



October 18, 1999

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals, TW-A325
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Notification – WT Docket No. 99-168

Dear Ms. Salas:

This letter is being filed on behalf of Motorola, Inc. (Motorola). On October 18, 1999, Rich Barth, Leigh Chinitz and Jeanine Poltronieri of Motorola met with Kathy Brown, Chief of Staff, Federal Communications Commission, to discuss its views on spectrum management as well as the *Notice of Proposed RuleMaking* in the above-referenced proceeding.

Motorola is encouraged that the Commission has acknowledged spectrum management as one of its core functions in its plans for the FCC in the 21st century. Motorola believes that spectrum management should be given attention at the highest levels within the agency. Motorola discussed its proposal that spectrum management issues be elevated within the FCC by having one Commissioner focus on spectrum management issues or by creating a Spectrum Council. Either of these suggestions would ensure better coordination of expert advice within the agency and result in better-informed decision making by the Commission. Motorola believes that only through active spectrum management can the FCC optimize the value of the spectrum to the public.

Motorola also discussed its view that if the Commission takes an active approach in the 746-806 MHz proceeding currently underway, it can substantially improve the efficient use of that spectrum and help satisfy the requirements of a wide range of users. Motorola shared its plan, in which the majority of the 36 MHz would be available for commercial services. A portion of the spectrum would, however, be made available, through auction, to private services. Motorola's proposal would allow private radio services to use the 1.5 MHz of spectrum at each edge of commercial bands, which would serve as guard bands to the 24 MHz of spectrum already allocated for public safety use. This results in a total of 6 MHz available for PMRS. This spectrum would be auctioned, and band managers would be allowed to bid, but use would be limited to private radio services.

Motorola's plan for the 746-806 MHz band provides the greatest benefit to the public by maximizing efficient use of the spectrum and minimizing the amount of spectrum used as guard-band to protect adjacent services. Both commercial mobile service providers and the private radio community have demonstrated the need for additional spectrum. Through active management of the spectrum the Commission can maximize its value to both these groups.

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Motorola indicated its willingness to continue to work with Commission staff to develop service rules for this spectrum that would maximize its potential use.

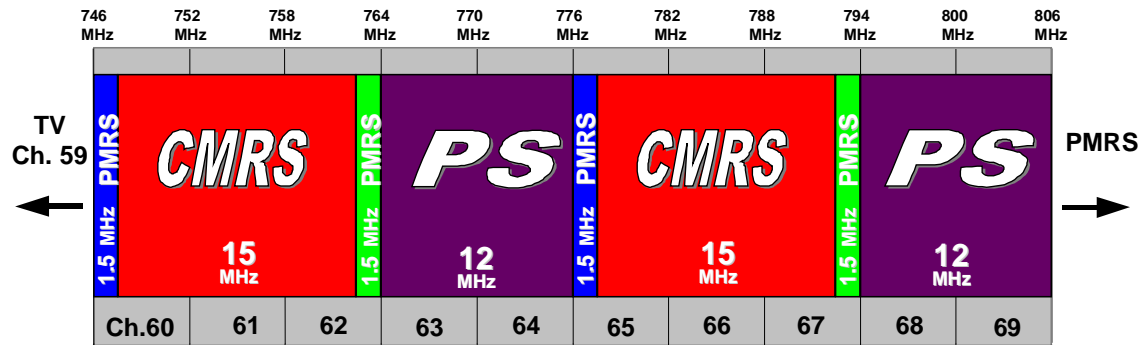
Attached to this letter is a copy of the band plan used at this meeting. Please contact Jeanine Poltronieri at (202) 371-6896 regarding any questions concerning this matter.

Respectfully Submitted,

Jeanine Poltronieri
Motorola, Inc.

Attachment
cc:
Kathy Brown

Band Plan



- 6 MHz allocated for private auctioned (PMRS), in two blocks of 1.5 + 1.5 MHz with band managers
- 30 MHz for Commercial Carriers (CMRS); 15+15 MHz.
- 24 MHz for public safety (allocation completed)